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Attorneys for Plaintiff
MARIA TORRES

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARIA TORRES,)	Case No.: 2:13-cv-00082-GMN-PAL
)	
Plaintiff,)	UNOPPOSED MOTION TO AMEND
)	AND EXTEND BRIEFING
vs.)	SCHEDULE
)	
CAROLYN W. COLVIN, Acting)	
)	
Commissioner of Social Security,)	
)	
Defendant ¹)	

Plaintiff MARIA TORRES (“Plaintiff”), through her undersigned counsel of record, requests the approval of the Court, to extend the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to August 8, 2013; and that

¹ Carolyn W. Colvin became the Acting Commissioner of Social Security on February 14, 2013. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn W. Colvin should be substituted for Michael J. Astrue as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 Defendant shall have until September 9, 2013, to file his opposition, if any is
2 forthcoming. Any reply by plaintiff will be due September 23, 2013.

3 An extension of time for plaintiff is needed due to a serious illness. The
4 spouse of the associate in Counsel's firm who this matter is assigned to receives
5 chemotherapy treatment for her Stage IV breast cancer which metastasized initially
6 to her liver and has now spread to her lungs and spine. Counsel requires the
7 additional time to file the Motion for Remand to allow the assigned attorney the
8 appropriate time to assist his Spouse and his two kindergarten and pre-school aged
9 children through this obviously stressful experience.

10 Counsel for defendant has indicated, via e-mail, that this motion to extend
11 the time to file is not opposed.

12
13 DATE: June 18, 2013,

Respectfully submitted,

14 ROHLFING & KALAGIAN, LLP

15 /s/ *Marc V. Kalagian*

16 BY: _____


Marc V. Kalagian

17 Attorney for plaintiff MARIA TORRES

1
2 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to
3 and including August 8, 2013, in which to file Plaintiff's Motion for Reversal
4 and/or Remand; Defendant may have an extension of time to September 9, 2013 to
5 consider the contentions raised in Plaintiff's Motion, and file any opposition if
6 necessary. Any reply by plaintiff will be due September 23, 2013.

7 IT IS SO ORDERED.

8 DATE: 6/21/2013

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10 THE HONORABLE PEGGY A. LEEN
11 UNITED STATES DISTRICT JUDGE
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